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VIA ELECTRONIC TRANSMISSION

Patrick Conway, MD
Deputy Administrator for Innovation & Quality,
CMS Chief Medical Officer
Centers for Medicare & Medicaid Services
7500 Security Boulevard
Baltimore, MD 21244

Re: "Non-Recommended PSA-Based Screening"

Dear Dr. Conway:

The American Association of Clinical Urologists (AACU), a professional association representing thousands of urologists from across the country, appreciates the opportunity to comment on the Centers for Medicare & Medicaid Services' (CMS) quality measure under development entitled, "Non-Recommended PSA-Based Screening." The AACU opposes the adoption of this proposed quality measure.

The AACU opposes any attempt to use the ordering of a prostate-specific antigen (PSA) test as a negative quality measure. Multiple experts in the diagnosis and treatment of prostate cancer who have researched PSA-based testing have found PSA-based testing to be an effective diagnostic tool.

The AACU and its urologist members, in addition to other leading societies, have emphasized the importance of an individualized decision on PSA-based testing between the patient and the physician. Physicians should not be penalized for ordering a test that, while not perfect, has long been recognized as an important tool in the diagnosis of prostate cancer. The AACU has strong concerns over the impact the adoption of this proposed quality measure would have on the early diagnosis and evaluation of patients with prostate cancer.

Accordingly, the AACU opposes any use or adoption of the proposed quality measure entitled, "Non-Recommended PSA-Based Screening." The AACU appreciates the opportunity to comment and is available for questions.

Sincerely,

Jeffrey M. Frankel, MD,
Health Policy Chair, American Association of Clinical Urologists

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